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March 1, 1983

Mr. Ernst P. Hall
Chief, Metals and Machinery
Branch
Effluent Guidelines Division
(WH-552)
United States Environmental
Protection Agency
401 M Street, Southwest
Washington, D.C. 20460

Re: Metal Molding & Casting Point
Source Category Effluent Limitations
and Guidelines, Pretreatment Standards,
47 Fed. Reg. 51512, November 15, 1982

Dear Mr. Hall:

On behalf of Cerro Copper Products Co. of East St. Louis Illinois, I am submitting comments with respect to the proposed effluent guidelines, limitations, pretreatment standards and new source performance standards published at 47 Fed. Reg. 51512, November 15, 1982.

As had been done in my letter to you of February 21, 1983, Cerro Copper specifically adopts the comments of the Copper and Brass Fabricators Council, addressing the effect of the proposed regulations on the metal molding and casting group of the copper and brass industry. The Council's comments are enclosed for your reference.

By this letter, Cerro Copper reiterates its comments of February 21, 1983 concerning the very serious impact that the proposed pretreatment regulations, particularly the removal credits provisions, could impose upon Cerro Copper and the Village of Sauget, Illinois. Since U.S.EPA has assured Cerro Copper that the pretreatment regulations were not intended to be applied in such a

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fashion as to jeopardize the operation of the Sauget POTW and the regional wastewater treatment plant for southwestern Illinois, Cerro Copper wishes to once again call this matter to your attention. On behalf of Cerro Copper, I renew my request that in considering the above-captioned regulations, U.S.EPA recognize the Sauget situation and make proper exception to it.

Very truly yours,

Richard J. Kissel / jcn
Richard J. Kissel

RJK:ek

Encl.

cc: Mr. Paul Tandler
Mr. Robert Wardell

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